

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

BRIDGEPORT PAIN CONTROL	)	
CENTER, LTD.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 1:09-cv-03987
	)	
STL INTERNATIONAL, INC.,	)	
and JOHN DOES 1-10,	)	
	)	
Defendants.	)	

**NOTICE OF REMOVAL**

Defendant STL International, Inc. ("STL") removes this action from the Circuit Court of Cook County, Illinois, to the United States District Court for the Northern District of Illinois, pursuant to 28 U.S.C. § 1441. In support, STL states as follows:

1. Plaintiff, Bridgeport Pain Control Center, Ltd. ("Bridgeport Pain Control"), initiated this action on May 21, 2009, by filing a complaint against STL in the Circuit Court of Cook County, Illinois, entitled *Bridgeport Pain Control Center, Ltd. v. STL International, Inc., et al.*, Case No. 09 CH 17079.

2. In its complaint, Bridgeport Pain Control alleges that STL sent it an unsolicited fax advertisement in violation of the Telephone Consumer Protection Act ("TCPA"), 47 U.S.C. § 227. Bridgeport Pain Control also asserts claims against STL for violation of the Illinois Consumer Fraud Act ("ICFA"), 815 ILCS 505/2, and conversion, based on the same alleged wrongful act.

3. Bridgeport Pain Control served STL with a summons and a copy of its complaint on June 2, 2009. Duplicates of summons and complaint, which constitute all process, pleadings, and orders served upon STL in this action, are attached to this Notice of Removal.

4. STL now removes this action from the Circuit Court of Cook County, Illinois, to this Court, based on federal question jurisdiction, 28 U.S.C. 1331. Specifically, this action arises under federal law, namely, the TCPA, and this Court, therefore, has original jurisdiction over it.

5. Further, the Court has supplemental jurisdiction, 28 U.S.C. 1367, over Bridgeport Pain Control's state-law claims for violation of the ICFA and conversion because those claims are based on the same operative facts as Bridgeport Pain Control's claim for violation of the TCPA, specifically, STL's alleged transmission of an unsolicited fax advertisement to Bridgeport Pain Control.

Dated: July 2, 2009.

Respectfully submitted,

s/Edward P. Gibbons

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